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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LVDG SERIES 125, established under
LVDG LLC, a Nevada series limited-liability
company,

Plaintiff,

vs.

FEDERAL HOME LOAN MORTGAGE
CORPORATION, a federally chartered
corporation; HAROLD M. WELLES, an
individual; VALERIE M. WELLES, an
individual; WELLS FARGO BANK, N.A.,
a national banking association; MTC
FINANCIAL INC. d/b/a TRUSTEE
CORPS, a California corporation; DOE
individuals I through XX; and ROE
CORPORATIONS I through XX,

Defendants.

WELLS FARGO BANK, N.A., a national
association; FEDERAL HOME LOAN
MORTGAGE CORPORATION,

Counter-Claimants,

vs.

LVDG SERIES 125, established under
LVDG LLC, a Nevada series limited-liability
company,

Counter-Defendant.

Case No. 3:13-cv-00503-LRH-WGC

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(FIRST REQUEST)

1 Pursuant to Fed. R. Civ. P. 26(f), and Local Rules 6-1, 26-1 and 26-4, Pursuant to Local
2 Rule 7-1, it is hereby stipulated by and between Wells Fargo Bank, N.A. (“Wells Fargo”) and
3 Federal Home Loan Mortgage Corporation (“Freddie Mac”) together with LVDG Series 125,
4 established under LVDG LLC (“LVDG” and jointly with Wells Fargo, and Freddie Mac the
5 “Parties”) by and through their respective undersigned counsel of record, submit this Stipulation
6 and Proposed Order to extend the dispositive motion deadline in this action. This is the Parties’
7 first request for extension of the dispositive motion deadline. The current dispositive motion
8 deadline is September 7, 2018, and the Stipulating Parties are seeking a forty-five day extension
9 until October 22, 2018. Discovery closed on August 7, 2018, and the Parties are not seeking to
10 extend discovery.

11 This request to extend the dispositive motion deadline is made in good faith, and is not for
12 purpose of delay or prejudice to any party, but to allow all parties to have enough time to brief
13 their dispositive motions, especially given the recent state and federal appellate-court decisions
14 which will impact the briefing in this case. Additionally, the Parties are continuing to consider
15 possible settlement and have been engaged in settlement negotiations.

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The requested extension will not result in undue delay or prejudice to any party and will serve to potentially minimize the expense to the Parties and to the Court if settlement is reached and if additional briefing is avoided.

DATED this 4th day of September, 2018.

SNELL & WILMER L.L.P.

/s/ Wayne Klomp

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Attorneys for Wells Fargo Bank, N.A. and

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DATED this 4th day of September, 2018.

ROGER P. CROTEAU & ASSOCIATES

/s/ Timothy E. Rhoda

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Attorneys for LVDG

IT IS SO ORDERED.

ORDER

William G. Cobb

UNITED STATES MAGISTRATE JUDGE

DATED: September 4, 2018